IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA	)	Criminal No. 2:16cr162
v.	)	18 U.S.C. § 641
	)	Theft of Government Property
KRISTIN MORRIS,	)	(Count One)
	)	
Defendant.	)	18 U.S.C. §981(a)(1)(C)
	)	Forfeiture Allegation

CRIMINAL INFORMATION

The United States Attorney charges that:

COUNT ONE

From in or around January 2015 through in or around February 2016, at the Navy Exchange located at 1560 Mall Drive, Norfolk, Virginia, in the Eastern District of Virginia, the defendant, KRISTIN MORRIS, willfully and knowingly did embezzle, steal, convert and purloin property belonging to the United States of America or a department or agency thereof, to wit: merchandise belonging to the Navy Exchange, an instrumentality of the federal government of the United States of America, in an amount greater than $1,000.

(In violation of Title 18, United States Code, Section 641.)

FORFEITURE ALLEGATION

THE U.S. ATTORNEY FURTHER ALLEGES THAT:

1. The defendant, if convicted the violation alleged in the sole count of the criminal information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violations.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.)

Respectfully submitted,

Dana J. Boente
UNITED STATES ATTORNEY

By: Alyssa K. Nichol
Alyssa K. Nichol
Massachusetts Bar No. 681778
Special Assistant United States Attorney
United States Attorney's Office
101 West Main Street, Suite 6000
Norfolk, VA 23510
Office Number - 757-441-3554
Email Address – Alyssa.nichol@usdoj.gov